

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE  
RETIRED PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

Hon. Anita B. Brody

**MOTION FOR LEAVE TO FILE**  
**SECOND AMENDED MASTER ADMINISTRATIVE COMPLAINT AGAINST THE**  
**RIDDELL DEFENDANTS**

Pursuant to Federal Rule of Civil Procedure 15(a)(2), Plaintiffs respectfully move this Honorable Court for leave to file the attached proposed Second Amended Master Administrative Long-Form Complaint Against Riddell Defendants (SAMLC-Riddell), and corresponding Short-Form Complaint Against Riddell Defendants (SFC-Riddell), to secure the rights of all plaintiffs who continue to maintain claims against Riddell Defendants after the Class Action Settlement Agreement was entered into with the NFL Defendants on February 13, 2015 ("Settlement Agreement") and the Class Action Settlement with the NFL Defendants was approved by this Court and finally effective as of January 7, 2017.

1. Plaintiffs are retired professional football players who played as part of the National Football League with Riddell helmets. Plaintiffs' claims against Riddell Defendants remain unresolved.

2. On May 9, 2017, the Court held an Organizational Meeting to address all cases in MDL No. 2323 with claims against Riddell Defendants. As a result of that meeting, on May 18, 2017, the Court issued an Order stating:

Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, as they requested, Co-Lead Counsel for Plaintiffs in the Riddell cases may file a motion for leave to file a Second Amended Master Administrative Complaint Against the Riddell Defendants (SAMAC-Riddell) and an Amended Short-Form Complaint Template for claims against the Riddell Defendants (SFC-Riddell) on or before May 24, 2017. Any such motion shall be accompanied by a supporting memorandum (not to exceed twenty-five (25) pages) describing how the SAMAC-Riddell and the SFC-Riddell comport with Rule 15(a)(2). Dkt. 7709 at \*2.

3. Federal Rule 15(a)(2) provides that “a party may amend its pleading [with] the court’s leave” and that “[t]he court should freely give leave when justice so requires.”

4. Plaintiffs continue to have claims they wish to pursue against the named Defendants in this litigation. Accordingly, these Plaintiffs seek to file the SAMLC-Riddell and accompanying SFC-Riddell to secure their rights and address their individual claims. Allowing Plaintiffs to file a SAMLC-Riddell would serve justice and promote judicial efficiency.

5. Plaintiffs respectfully submit that those plaintiffs filing motions seeking remand should be heard by this Honorable Court and those motions shall be made pursuant to the Court’s instructions.

WHEREFORE, Plaintiffs respectfully request that their Motion for Leave to File Second Amended Master Administrative Long-Form Complaint Against the Riddell Defendants be granted.

Dated: May 24, 2017

Respectfully Submitted,

By: /s/ Wendy R. Fleishman  
Wendy R. Fleishman

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*Co-Lead Counsel on Behalf of Plaintiffs  
Against Riddell*